

Before the Federal Communications Commission

In the Matter of)
Promoting Telehealth for)
Low-Income Consumers)

WC Docket No. 18-213

September 10, 2018

Comments of the Telecommunications Association of Maine

The Telecommunications Association of Maine (TAM) offers the following comments on the Notice of Inquiry, Released on August 3, 2018, in the above captioned proceeding (“NOI”). TAM’s members are Rural Local Exchange Carriers providing voice and broadband service in Maine.

TAM appreciates the opportunity to comment on the NOI in this issue, as telehealth is a critical issue in Maine. Maine is demographically the oldest State in the nation, with a very rural population. An issue of substantial concern in Maine is Aging in Place, the ability of people to remain in their homes as long as possible. Broadband is an essential component of being able to age in place, as it brings connectivity to elderly individuals in rural locations where there is often no public transportation and essential services are miles away. TAM strongly supports the goal of Connected Care Everywhere as described in the NOI. Providing broadband to specific locations such as community anchor institutions actually disadvantages rural populations such as those in Maine. In an urban setting, connecting a hospital may well make it more affordable to provide service to the businesses and housing locations that immediately surround the hospital. However, in a rural area, the individuals who most need access to health care services often live miles away from the nearest rural health care locations. Connecting these health care locations does not make it any more cost effective to provide access to rural customers, and indeed siphons resources away from the higher cost, low density areas of a community. Additionally, community anchor institutions are by their very nature entities that have a need for more significant broadband connections that will make them more attractive for competitors to serve. They also tend to be in the lower cost areas of a rural community where there is a better economic case for investment by the market. The more significant need is in areas where there is not a sufficient economic incentive for any provider to offer service, much less multiple competitors.

TAM believes the best approach for expending resources is to support expansion of broadband to the higher cost areas of communities to ensure that rural individuals can benefit from modern advances in telehealth. The reality of health care is that it directly impacts everyone, wherever they may live. There is no way of knowing who will have a difficult pregnancy where remote monitoring could be crucial in supporting the health of the mother and child, and there is no way of knowing who will have a stroke that requires daily monitoring to catch any potential danger for a follow-up event. The only way to ensure the benefits of telehealth for all citizens is to support a network that makes services available to even the most rural customer.

TAM also agrees that support should only be available for projects that involve Eligible Telecommunications Carriers (ETCs). One of the unforeseen consequences of the history of broadband support is that the targeted silo approach to supporting broadband has given rise to a fragmented patchwork of access, with schools and hospitals having substantial broadband connections while children lack access to do homework and patients cannot connect remotely to their health care providers. A holistic approach to broadband is critical to fully realize the advantages of these technologies. By limiting support to projects that involve an ETC the Commission can begin to blend existing programs to maximize the benefit for public dollars. One difficulty in serving rural populations is many customers are low income or living on fixed incomes. An ETC would be able to offer lifeline support to these customers. Additionally, the Commission is using public dollars to support ETCs through the A-CAM and CAF II programs. By keeping support focused on ETCs the Commission can leverage existing programs to have a greater impact in these rural areas. Finally, any time there is an expenditure of public dollars, there must be accountability. The reality is that ETCs are accountable to the Commission and must certify and demonstrate that all funds received are being used for the express purposes for which the funds have been provided. By requiring participation by an ETC, the Commission can pool a number of existing resources to act as multipliers to the pilot project funding in a manner that will make it much more viable for a company to make the necessary private investments to provide the services rural customers need and deserve.

More and more, broadband is becoming a utility rather than a luxury. The Commission has a hundred years of experience with working with providers to deploy utility service. At the end of the day it is simply economics. There is no magic bullet, no wild new idea, that will magically solve the issue. High cost areas with low population densities do not make economic sense to serve in a competitive market, but that does not mean that citizens living in those areas should be left behind. Where competition works, such as in urban areas and service centers where community anchor institutions reside, the competitive market should be allowed to thrive. But where the competitive market will not go, the public interest is best served by aggregating support to entities such as ETCs that are subject to the regulatory authority of the Commission and treating the service as a utility that should be supported by public dollars in an efficient and effective manner under direct oversight of the Commission. The pilot project envisioned by the NOI can be a first step in accomplishing this important objective and ensuring that all Americans have equal opportunities regardless of where they live.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Ben Sanborn", with a stylized flourish at the end.

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